

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

MARIA VICTORIA PEREZ, KAEWA
R.M. BROWN, and CAROLINE
WHITAKER, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

ALLSTATE INSURANCE COMPANY,
Defendant.

11-CV-1812 (AMD) (AKT)

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' UNOPPOSED
MOTION FOR APPROVAL OF
DISPUTE ADJUSTER
SETTLEMENT, SERVICE AWARD,
AND ATTORNEYS' FEES AND
EXPENSES**

This matter came before the Court on Plaintiffs' Unopposed Motion for Approval of Dispute Adjuster Settlement, Service Award, and Attorneys' Fees and Expenses ("Settlement Approval Motion").

1. Based upon the Court's review of Plaintiffs' Settlement Approval Motion and supporting materials, the Court grants approval of the Addendum to Joint Agreement of Settlement and Release ("Settlement Addendum"). Defendant shall not be required to answer or respond to Plaintiffs' Second Amended Complaint, which is to effectuate this settlement, and shall have all defenses preserved.

2. The Court approves the Proposed Settlement Notice and its distribution.
3. The Court approves a Service Award of \$5,000 to Plaintiff Caroline Whitaker.
4. The Court approves Plaintiffs' request for \$141,996.66 in Attorneys' fees.
5. The Court approves the third-party Settlement Administrator, Rust Consulting.
6. The Court incorporates the terms of the Settlement Addendum.

7. The Court dismisses this matter with prejudice.
8. The Court retains jurisdiction to enforce the Settlement Addendum.

It is so ORDERED this _____ day of _____, 2021.

Judge A. Kathleen Tomlinson